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and together with Plaintiffs, the "Parties") by and through their undersigned counsel, for good cause shown, hereby stipulate and agree to extend Wells Fargo's deadline to file its Response to Plaintiffs' Fourth Motion to Compel Wells Fargo Bank, N.A. to Produce Documents and Add Custodians [ECF No. 70] (the "Motion") by two days, from Wednesday, August 11, 2021, to Friday, August 13, 2021 for the following reasons:

- 1. Plaintiffs filed the Motion on July 28, 2021 [ECF No. 70].
- 2. Wells Fargo's Response to the Motion [ECF No. 70] is currently due on August 11, 2021.
- 3. A hearing on the Motion [ECF No. 70] is currently set for September 21, 2021 before the Honorable Magistrate Judge Brenda Weksler, as stated in the Court's July 29, 2021 Minute Order [ECF No. 74].
- 4. Wells Fargo asserts that there is good cause for two additional days to file its Response to allow for input from key individuals who have been or are currently, out of the office.
- 5. Wells Fargo also requests this brief extension to analyze and respond to Plaintiffs' Motion to ensure that the numerous issues raised in the Motion are addressed. This additional basis also qualifies as good cause.
- 6. No prejudice will result due to a 2-day extension, considering the hearing is not scheduled until September 21, 2021.

This extension request is sought in good faith and is not made for the purpose of delay.

THEREFORE, for good cause shown, the Parties respectfully request an extension for Wells Fargo its Response to the Motion [ECF No. 70] from August 11, 2021, to and including August 13, 2021.

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| Note | 1 | DATED this 9th day of August, 2021. | DATED this 9th day of August, 2021. |
|------|----|---|--|
| | | SNELL & WILMER L.L.P. | • |
| | 3 | s/Erica J. Stutman | CAPRIO LAW, P.A. <u>s/Courtney Caprio</u> (with permission) |
| | 4 | Jeffrey Willis Nevada Bar No. 4797 Erica J. Stutman Nevada Bar No. 10794 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, Nevada 89169 Attorneys for Wells Fargo Bank, N.A., Katherine Darrall, and Jose Rico | Courtney Caprio (<i>pro hac vice</i>) Florida Bar No. 933961 |
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| | 10 | | AXS LAW GROUP, PLLC |
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| | 12 | | Andrew E. Beaulieu Florida Bar No. 115097 |
| | 13 | | Jeffrey W. Gutchess Florida Bar No. 702641 |
| | 14 | | 2121 NW 2 nd Avenue, Suite 201 Miami, Florida 33127 |
| | 15 | | Attorneys for Plaintiffs |
| | 16 | | Thorneys for I tallings |
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| | 19 | IT IS SO ORDERED. | Renbucken |
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| | 22 | - | UNITED STATES MAGISTRATE JUDGE |
| | 23 | D. | ATED: |
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